

**William A. Romaine #126966**  
[war@lawromaine.com](mailto:war@lawromaine.com)  
**Zishan Lokhandwala #325567**  
**Romaine Lokhandwala Law Group, LLP**  
3323 South Fairway Street, Suite 5  
Visalia, California 93277

Telephone: 559 625 6020  
Telecopier: 559 625 6024

Attorneys for Defendants Ivonne Munoz, Manuel  
Vazquez, Yvonne Mesinas, Surtimex LLC,  
V&S Investment Group, Surtimex Global Inc.,  
Distrubuidora Vitian, S.A. de C.V., Leni's  
Industries, Inc.

**United States District Court  
Central District of California**

**SUEROS&BEBIDAS  
REHIDRATANTES, S.A. de C.V., a  
Mexican company, and CAB  
ENTERPRISES, INC., a Delaware  
corporation,**

**Plaintiffs,**

**vs.**

**Eduardo Lopez, Ivonne Munoz,  
Manuel Vazquez, Yvonne Mesinas,  
Surtimex LLC, a California limited  
liability company, V&S Investment  
Group, Surtimex Global Inc., a  
California corporation  
Distrubuidora Vitian, S.A. de C.V., a  
Mexican company, Leni's  
Industries, Inc., a California  
corporation,**

**Defendants.**

Case Number: 2:24-cv-10102

**ANSWER TO COMPLAINT**

Defendants Ivonne Munoz, Manuel Vazquez, Yvonne Mesinas, Surtimex  
LLC, a California limited liability company, V&S Investment Group, Surtimex

Global Inc., a California corporation Distrubuidora Vitian, S.A. de C.V., a Mexican company, Leni's Industries, Inc., a California corporation, hereby answer the complaint filed in the above entitled matter as follows:

1. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 1 of the complaint and therefore, on that basis, deny those allegations in their entirety.
2. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 2 of the complaint and therefore, on that basis, deny those allegations in their entirety.
3. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 3 of the complaint and therefore, on that basis, deny those allegations in their entirety.
4. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 4 of the complaint and therefore, on that basis, deny those allegations in their entirety.
5. These answering defendants deny the allegations set forth in paragraph 5 of the complaint in their entirety.
6. These answering defendants deny the allegations set forth in paragraph 6 of the complaint in their entirety.
7. These answering defendants deny the allegations set forth in paragraph 7 of the complaint in their entirety.

- 1 8. These answering defendants deny the allegations set forth in
- 2 paragraph 8 of the complaint in their entirety.
- 3
- 4 9. These answering defendants lack sufficient information and/or belief
- 5 to admit the allegations set forth in paragraph 9 of the complaint and
- 6 therefore, on that basis, deny those allegations in their entirety.
- 7
- 8 10. These answering defendants lack sufficient information and/or belief
- 9 to admit the allegations set forth in paragraph 10 of the complaint and
- 10 therefore, on that basis, deny those allegations in their entirety.
- 11
- 12 11. These answering defendants lack sufficient information and/or belief
- 13 to admit the allegations set forth in paragraph 11 of the complaint and
- 14 therefore, on that basis, deny those allegations in their entirety.
- 15
- 16 12. These answering defendants lack sufficient information and/or belief
- 17 to admit the allegations set forth in paragraph 12 of the complaint and
- 18 therefore, on that basis, deny those allegations in their entirety.
- 19
- 20 13. These answering defendants lack sufficient information and/or belief
- 21 to admit the allegations set forth in paragraph 13 of the complaint and
- 22 therefore, on that basis, deny those allegations in their entirety.
- 23
- 24 14. These answering defendants admit the allegations set forth in
- 25 paragraph 14 of the complaint, except for any allegations that the offer
- 26 of sale, or sale of Electrolit by Eduardo Lopez is unauthorized which
- 27 allegation is denied.
- 28

1 15. These answering defendants deny the allegations set forth in  
2 paragraph 15 of the complaint in their entirety.

3 16. These answering defendants admit the allegations set forth in  
4 paragraph 15 of the complaint, except for any allegations that the offer  
5 of sale, or sale of Electrolit by Yvonne Munoz is unauthorized which  
6 allegation is denied.  
7

8 17. These answering defendants deny the allegations set forth in  
9 paragraph 17 of the complaint in their entirety.

10 18. These answering defendants admit the allegations set forth in  
11 paragraph 18 of the complaint.  
12

13 19. These answering defendants deny the allegations set forth in  
14 paragraph 19 of the complaint in their entirety.  
15

16 20. These answering defendants deny the allegations set forth in  
17 paragraph 20 of the complaint in their entirety.  
18

19 21. These answering defendants lack sufficient information and/or belief  
20 to admit the allegations set forth in paragraph 21 of the complaint and  
21 therefore, on that basis, deny those allegations in their entirety.  
22

23 22. These answering defendants admit the allegations set forth in  
24 paragraph 22 of the complaint.

25 23. These answering defendants lack sufficient information and/or belief  
26 to admit the allegations set forth in paragraph 23 of the complaint and  
27 therefore, on that basis, deny those allegations in their entirety.  
28

24. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, deny those allegations in their entirety.
25. These answering defendants admit the allegations set forth in paragraph 25 of the complaint.
26. These answering defendants admit the allegations set forth in paragraph 26 of the complaint.
27. These answering defendants admit the allegations set forth in paragraph 27 of the complaint.
28. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 28 of the complaint and therefore, on that basis, deny those allegations in their entirety.
29. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 29 of the complaint and therefore, on that basis, deny those allegations in their entirety.
30. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 30 of the complaint and therefore, on that basis, deny those allegations in their entirety.
31. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 31 of the complaint and therefore, on that basis, deny those allegations in their entirety.

32. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 32 of the complaint and therefore, on that basis, deny those allegations in their entirety.

33. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 33 of the complaint and therefore, on that basis, deny those allegations in their entirety.

34. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 34 of the complaint and therefore, on that basis, deny those allegations in their entirety.

35. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 35 of the complaint and therefore, on that basis, deny those allegations in their entirety.

36. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 36 of the complaint and therefore, on that basis, deny those allegations in their entirety.

37. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 37 of the complaint and therefore, on that basis, deny those allegations in their entirety.

38. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, deny those allegations in their entirety.

1 39. These answering defendants lack sufficient information and/or belief  
2 to admit the allegations set forth in paragraph 24 of the complaint and  
3 therefore, on that basis, deny those allegations in their entirety.  
4

5 40. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 40 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 41. These answering defendants lack sufficient information and/or belief  
10 to admit the allegations set forth in paragraph 41 of the complaint and  
11 therefore, on that basis, deny those allegations in their entirety.  
12

13 42. These answering defendants lack sufficient information and/or belief  
14 to admit the allegations set forth in paragraph 42 of the complaint and  
15 therefore, on that basis, deny those allegations in their entirety.  
16

17 43. These answering defendants lack sufficient information and/or belief  
18 to admit the allegations set forth in paragraph 43 of the complaint and  
19 therefore, on that basis, deny those allegations in their entirety.  
20

21 44. These answering defendants lack sufficient information and/or belief  
22 to admit the allegations set forth in paragraph 44 of the complaint and  
23 therefore, on that basis, deny those allegations in their entirety.  
24

25 45. These answering defendants lack sufficient information and/or belief  
26 to admit the allegations set forth in paragraph 45 of the complaint and  
27 therefore, on that basis, deny those allegations in their entirety.  
28

1 46. These answering defendants lack sufficient information and/or belief  
2 to admit the allegations set forth in paragraph 46 of the complaint and  
3 therefore, on that basis, deny those allegations in their entirety.  
4

5 47. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 47 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 48. These answering defendants lack sufficient information and/or belief  
10 to admit the allegations set forth in paragraph 48 of the complaint and  
11 therefore, on that basis, deny those allegations in their entirety.  
12

13 49. These answering defendants lack sufficient information and/or belief  
14 to admit the allegations set forth in paragraph 49 of the complaint and  
15 therefore, on that basis, deny those allegations in their entirety.  
16

17 50. These answering defendants lack sufficient information and/or belief  
18 to admit the allegations set forth in paragraph 50 of the complaint and  
19 therefore, on that basis, deny those allegations in their entirety.  
20

21 51. These answering defendants lack sufficient information and/or belief  
22 to admit the allegations set forth in paragraph 51 of the complaint and  
23 therefore, on that basis, deny those allegations in their entirety.  
24

25 52. These answering defendants lack sufficient information and/or belief  
26 to admit the allegations set forth in paragraph 52 of the complaint and  
27 therefore, on that basis, deny those allegations in their entirety.  
28



53. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 53 of the complaint and therefore, on that basis, deny those allegations in their entirety.

54. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 54 of the complaint and therefore, on that basis, deny those allegations in their entirety.

55. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 55 of the complaint and therefore, on that basis, deny those allegations in their entirety.

56. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 56 of the complaint and therefore, on that basis, deny those allegations in their entirety.

57. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, deny those allegations in their entirety.

58. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, deny those allegations in their entirety.

59. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 59 of the complaint and therefore, on that basis, deny those allegations in their entirety.

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60. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 60 of the complaint and therefore, on that basis, deny those allegations in their entirety.

61. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 61 of the complaint and therefore, on that basis, deny those allegations in their entirety.

62. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 62 of the complaint and therefore, on that basis, deny those allegations in their entirety.

63. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 63 of the complaint and therefore, on that basis, deny those allegations in their entirety.

64. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 40 of the complaint and therefore, on that basis, deny those allegations in their entirety.

65. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 65 of the complaint and therefore, on that basis, deny those allegations in their entirety.

66. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 66 of the complaint and therefore, on that basis, deny those allegations in their entirety.

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67. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 67 of the complaint and therefore, on that basis, deny those allegations in their entirety.

68. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 68 of the complaint and therefore, on that basis, deny those allegations in their entirety.

69. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 69 of the complaint and therefore, on that basis, deny those allegations in their entirety.

70. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 70 of the complaint and therefore, on that basis, deny those allegations in their entirety.

71. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 71 of the complaint and therefore, on that basis, deny those allegations in their entirety.

72. These answering defendants deny the allegations set forth in paragraph 72 of the complaint in their entirety.

73. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 73 of the complaint and therefore, on that basis, deny those allegations in their entirety.

74. These answering defendants admit the allegations set forth in paragraph 74 of the complaint, except for any allegations that

1 individuals perform any alleged activities in their personal capacity  
2 and the offer of sale, or sale of Electrolit is unauthorized, which  
3 allegations are denied.  
4

5 75. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 75 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 76. These answering defendants deny the allegations set forth in  
10 paragraph 76 of the complaint in their entirety.  
11

12 77. These answering defendants lack sufficient information and/or belief  
13 to admit the allegations set forth in paragraph 77 of the complaint and  
14 therefore, on that basis, deny those allegations in their entirety.  
15

16 78. These answering defendants deny the allegations set forth in  
17 paragraph 78 of the complaint in their entirety.  
18

19 79. These answering defendants deny the allegations set forth in  
20 paragraph 79 of the complaint in their entirety.  
21

22 80. These answering defendants deny the allegations set forth in  
23 paragraph 80 of the complaint in their entirety.  
24

25 81. These answering defendants lack sufficient information and/or belief  
26 to admit the allegations set forth in paragraph 81 of the complaint and  
27 therefore, on that basis, deny those allegations in their entirety.  
28

82. These answering defendants deny the allegations set forth in  
paragraph 82 of the complaint in their entirety.

1 83. These answering defendants lack sufficient information and/or belief  
2 to admit the allegations set forth in paragraph 83 of the complaint and  
3 therefore, on that basis, deny those allegations in their entirety.  
4

5 84. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 84 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 85. These answering defendants lack sufficient information and/or belief  
10 to admit the allegations set forth in paragraph 85 of the complaint and  
11 therefore, on that basis, deny those allegations in their entirety.  
12

13 86. These answering defendants deny the allegations set forth in  
14 paragraph 82 of the complaint in their entirety.  
15

16 87. These answering defendants lack sufficient information and/or belief  
17 to admit the allegations set forth in paragraph 87 of the complaint and  
18 therefore, on that basis, deny those allegations in their entirety.  
19

20 88. These answering defendants lack sufficient information and/or belief  
21 to admit the allegations set forth in paragraph 88 of the complaint and  
22 therefore, on that basis, deny those allegations in their entirety.  
23

24 89. These answering defendants lack sufficient information and/or belief  
25 to admit the allegations set forth in paragraph 89 of the complaint and  
26 therefore, on that basis, deny those allegations in their entirety.  
27

28 90. These answering defendants deny the allegations set forth in  
paragraph 90 of the complaint in their entirety.

1 91. These answering defendants lack sufficient information and/or belief  
2 to admit the allegations set forth in paragraph 91 of the complaint and  
3 therefore, on that basis, deny those allegations in their entirety.  
4

5 92. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 92 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 93. These answering defendants lack sufficient information and/or belief  
10 to admit the allegations set forth in paragraph 93 of the complaint and  
11 therefore, on that basis, deny those allegations in their entirety.  
12

13 94. These answering defendants deny the allegations set forth in  
14 paragraph 94 of the complaint in their entirety.  
15

16 95. These answering defendants lack sufficient information and/or belief  
17 to admit the allegations set forth in paragraph 95 of the complaint and  
18 therefore, on that basis, deny those allegations in their entirety.  
19

20 96. These answering defendants lack sufficient information and/or belief  
21 to admit the allegations set forth in paragraph 96 of the complaint and  
22 therefore, on that basis, deny those allegations in their entirety.  
23

24 97. These answering defendants lack sufficient information and/or belief  
25 to admit the allegations set forth in paragraph 97 of the complaint and  
26 therefore, on that basis, deny those allegations in their entirety.  
27

28 98. These answering defendants deny the allegations set forth in  
paragraph 98 of the complaint in their entirety.

1 99. These answering defendants lack sufficient information and/or belief  
2 to admit the allegations set forth in paragraph 99 of the complaint and  
3 therefore, on that basis, deny those allegations in their entirety.  
4

5 100. These answering defendants lack sufficient information  
6 and/or belief to admit the allegations set forth in paragraph 100 of the  
7 complaint and therefore, on that basis, deny those allegations in their  
8 entirety.  
9

10 101. These answering defendants lack sufficient information  
11 and/or belief to admit the allegations set forth in paragraph 101 of the  
12 complaint and therefore, on that basis, deny those allegations in their  
13 entirety.  
14

15 102. These answering defendants lack sufficient information  
16 and/or belief to admit the allegations set forth in paragraph 102 of the  
17 complaint and therefore, on that basis, deny those allegations in their  
18 entirety.  
19

20 103. These answering defendants lack sufficient information  
21 and/or belief to admit the allegations set forth in paragraph 103 of the  
22 complaint and therefore, on that basis, deny those allegations in their  
23 entirety.  
24

25 104. These answering defendants lack sufficient information  
26 and/or belief to admit the allegations set forth in paragraph 104 of the  
27  
28

1 complaint and therefore, on that basis, deny those allegations in their  
2 entirety.

3  
4 105. These answering defendants deny the allegations set forth in  
5 paragraph 105 of the complaint in their entirety.

6  
7 106. These answering defendants deny the allegations set forth in  
8 paragraph 106 of the complaint in their entirety.

9  
10 107. These answering defendants lack sufficient information  
11 and/or belief to admit the allegations set forth in paragraph 107 of the  
12 complaint and therefore, on that basis, deny those allegations in their  
13 entirety.

14  
15 108. These answering defendants lack sufficient information  
16 and/or belief to admit the allegations set forth in paragraph 108 of the  
17 complaint and therefore, on that basis, deny those allegations in their  
18 entirety.

19  
20 109. These answering defendants deny and admit the allegations  
21 set forth and/or incorporated by reference in paragraph 109 in direct  
22 accordance with these answering defendants' answer to the  
23 allegations therein referenced by incorporation.

24  
25 110. These answering defendants lack sufficient information  
26 and/or belief to admit the allegations set forth in paragraph 110 of the  
27 complaint and therefore, on that basis, deny those allegations in their  
28 entirety.



111. These answering defendants deny the allegations set forth in paragraph 111 of the complaint in their entirety.

112. These answering defendants deny the allegations set forth in paragraph 112 of the complaint in their entirety.

113. These answering defendants deny the allegations set forth in paragraph 113 of the complaint in their entirety.

114. These answering defendants deny the allegations set forth in paragraph 114 of the complaint in their entirety.

115. These answering defendants deny the allegations set forth in paragraph 115 of the complaint in their entirety.

116. These answering defendants deny the allegations set forth in paragraph 116 of the complaint in their entirety.

117. These answering defendants deny the allegations set forth in paragraph 117 in their entirety.

118. These answering defendants deny the allegations set forth in paragraph 118 of the complaint in their entirety.

119. These answering defendants deny and admit the allegations set forth and/or incorporated by reference in paragraph 119 in direct accordance with these answering defendants' answer to the allegations therein referenced by incorporation.

120. These answering defendants deny the allegations set forth in paragraph 120 of the complaint in their entirety.

121. These answering defendants deny the allegations set forth in paragraph 121 of the complaint in their entirety.

122. These answering defendants deny the allegations set forth in paragraph 122 of the complaint in their entirety.

123. These answering defendants deny the allegations set forth in paragraph 123 of the complaint in their entirety.

124. These answering defendants deny the allegations set forth in paragraph 124 of the complaint in their entirety.

125. These answering defendants deny the allegations set forth in paragraph 125 of the complaint in their entirety.

126. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 126 of the complaint and therefore, on that basis, deny those allegations in their entirety.

127. These answering defendants deny the allegations set forth in paragraph 127 of the complaint in their entirety.

128. These answering defendants deny the allegations set forth in paragraph 128 of the complaint in their entirety.

129. These answering defendants deny the allegations set forth in paragraph 129 of the complaint in their entirety.

130. These answering defendants deny the allegations set forth in paragraph 130 of the complaint in their entirety.

1           131.           These answering defendants deny and admit the allegations  
2                   set forth and/or incorporated by reference in paragraph 131 in direct  
3                   accordance with these answering defendants' answer to the  
4                   allegations therein referenced by incorporation.  
5

6           132.           These answering defendants deny the allegations set forth in  
7                   paragraph 132 of the complaint in their entirety.  
8

9           133.           These answering defendants deny the allegations set forth in  
10                  paragraph 133 of the complaint in their entirety.  
11

12           134.           These answering defendants deny the allegations set forth in  
13                  paragraph 134 of the complaint in their entirety.  
14

15           135.           These answering defendants deny the allegations set forth in  
16                  paragraph 135 of the complaint in their entirety.  
17

18           136.           These answering defendants deny the allegations set forth in  
19                  paragraph 136 of the complaint in their entirety.  
20

21           137.           These answering defendants deny the allegations set forth in  
22                  paragraph 137 of the complaint in their entirety.  
23

24           138.           These answering defendants deny the allegations set forth in  
25                  paragraph 138 of the complaint in their entirety.  
26

27           139.           These answering defendants deny and admit the allegations  
28                   set forth and/or incorporated by reference in paragraph 139 in direct  
                accordance with these answering defendants' answer to the  
                allegations therein referenced by incorporation.

1           140.           These answering defendants deny the allegations set forth in  
2                   paragraph 140 of the complaint in their entirety.

3           141.           These answering defendants deny the allegations set forth in  
4                   paragraph 141 of the complaint in their entirety.

5           142.           These answering defendants deny the allegations set forth in  
6                   paragraph 142 of the complaint in their entirety.

7           143.           These answering defendants deny the allegations set forth in  
8                   paragraph 143 of the complaint in their entirety.

9           144.           These answering defendants lack sufficient information  
10                  and/or belief to admit the allegations set forth in paragraph 144 of the  
11                  complaint and therefore, on that basis, deny those allegations in their  
12                  entirety.

13           145.           These answering defendants deny the allegations set forth in  
14                   paragraph 145 of the complaint in their entirety.

15           146.           These answering defendants deny and admit the allegations  
16                  set forth and/or incorporated by reference in paragraph 146 in direct  
17                  accordance with these answering defendants' answer to the  
18                  allegations therein referenced by incorporation.

19           147.           These answering defendants deny the allegations set forth in  
20                   paragraph 147 of the complaint in their entirety.

21           148.           These answering defendants deny and admit the allegations  
22                  set forth and/or incorporated by reference in paragraph 148 in direct  
23  
24  
25  
26  
27  
28

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.

3  
4 149. These answering defendants deny the allegations set forth in  
5 paragraph 149 of the complaint in their entirety.

6 150. These answering defendants lack sufficient information  
7 and/or belief to admit the allegations set forth in paragraph 150 of the  
8 complaint and therefore, on that basis, deny those allegations in their  
9 entirety.

10  
11 151. These answering defendants deny the allegations set forth in  
12 paragraph 151 of the complaint in their entirety.

13  
14 152. These answering defendants deny and admit the allegations  
15 set forth and/or incorporated by reference in paragraph 152 in direct  
16 accordance with these answering defendants' answer to the  
17 allegations therein referenced by incorporation.

18  
19 153. These answering defendants deny the allegations set forth in  
20 paragraph 153 of the complaint in their entirety.

21 154. These answering defendants deny the allegations set forth in  
22 paragraph 154 of the complaint in their entirety.

23  
24 155. These answering defendants deny the allegations set forth in  
25 paragraph 155 of the complaint in their entirety.

26  
27 156. These answering defendants deny the allegations set forth in  
28 paragraph 156 of the complaint in their entirety.

1           157.           These answering defendants deny the allegations set forth in  
2                   paragraph 157 of the complaint in their entirety.

3           158.           These answering defendants deny the allegations set forth in  
4                   paragraph 158 of the complaint in their entirety.

5           159.           These answering defendants deny the allegations set forth in  
6                   paragraph 159 of the complaint in their entirety.

7           160.           These answering defendants deny the allegations set forth in  
8                   paragraph 160 of the complaint in their entirety.

9           161.           These answering defendants deny the allegations set forth in  
10                  paragraph 161 of the complaint in their entirety.

11          162.           These answering defendants deny the allegations set forth in  
12                  paragraph 162 of the complaint in their entirety.

13          163.           These answering defendants deny and admit the allegations  
14                  set forth and/or incorporated by reference in paragraph 163 in direct  
15                  accordance with these answering defendants' answer to the  
16                  allegations therein referenced by incorporation.

17          164.           These answering defendants deny the allegations set forth in  
18                  paragraph 164 of the complaint in their entirety.

19          165.           These answering defendants deny the allegations set forth in  
20                  paragraph 165 of the complaint in their entirety.

21          166.           These answering defendants deny the allegations set forth in  
22                  paragraph 166 of the complaint in their entirety.

1           167.           These answering defendants deny and admit the allegations  
2                   set forth and/or incorporated by reference in paragraph 167 in direct  
3                   accordance with these answering defendants' answer to the  
4                   allegations therein referenced by incorporation.

5  
6           168.           These answering defendants deny the allegations set forth in  
7                   paragraph 168 of the complaint in their entirety.

8  
9           169.           These answering defendants deny the allegations set forth in  
10                  paragraph 169 of the complaint in their entirety.

11           170.           These answering defendants deny the allegations set forth in  
12                  paragraph 170 of the complaint in their entirety.

13  
14           171.           These answering defendants deny the allegations set forth in  
15                  paragraph 171 of the complaint in their entirety.

16           172.           These answering defendants deny and admit the allegations  
17                   set forth and/or incorporated by reference in paragraph 172 in direct  
18                   accordance with these answering defendants' answer to the  
19                   allegations therein referenced by incorporation.

20  
21           173.           These answering defendants deny the allegations set forth in  
22                  paragraph 173 of the complaint in their entirety.

23  
24           174.           These answering defendants deny the allegations set forth in  
25                  paragraph 174 of the complaint in their entirety.

26  
27           175.           These answering defendants deny and admit the allegations  
28                   set forth and/or incorporated by reference in paragraph 175 in direct

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.

3  
4 176. These answering defendants deny the allegations set forth in  
5 paragraph 176 of the complaint in their entirety.

6  
7 177. These answering defendants deny the allegations set forth in  
8 paragraph 177 of the complaint in their entirety.

9  
10 178. These answering defendants deny the allegations set forth in  
11 paragraph 178 of the complaint in their entirety.

12  
13 179. These answering defendants deny the allegations set forth in  
14 paragraph 174 of the complaint in their entirety.

15  
16 180. These answering defendants deny the allegations set forth in  
17 paragraph 180 of the complaint in their entirety.

18  
19 181. These answering defendants deny the allegations set forth in  
20 paragraph 181 of the complaint in their entirety.

21  
22 182. These answering defendants deny the allegations set forth in  
23 paragraph 182 of the complaint in their entirety.

24  
25 183. These answering defendants deny the allegations set forth in  
26 paragraph 183 of the complaint in their entirety.

27  
28 184. These answering defendants deny the allegations set forth in  
paragraph 184 of the complaint in their entirety.

185. These answering defendants deny and admit the allegations  
set forth and/or incorporated by reference in paragraph 185 in direct



1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.

3  
4 186. These answering defendants lack sufficient information  
5 and/or belief to admit the allegations set forth in paragraph 186 of the  
6 complaint and therefore, on that basis, deny those allegations in their  
7 entirety.

8  
9 187. These answering defendants deny the allegations set forth in  
10 paragraph 187 of the complaint in their entirety.

11 188. These answering defendants deny the allegations set forth in  
12 paragraph 188 of the complaint in their entirety.

13  
14 189. These answering defendants deny the allegations set forth in  
15 paragraph 189 of the complaint in their entirety.

16 190. These answering defendants deny the allegations set forth in  
17 paragraph 190 of the complaint in their entirety.

18  
19 191. These answering defendants deny the allegations set forth in  
20 paragraph 191 of the complaint in their entirety.

21 192. These answering defendants deny the allegations set forth in  
22 paragraph 192 of the complaint in their entirety.

23  
24 193. These answering defendants deny the allegations set forth in  
25 paragraph 193 of the complaint in their entirety.

26 194. These answering defendants deny and admit the allegations  
27 set forth and/or incorporated by reference in paragraph 194 in direct  
28

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.

3  
4 195. These answering defendants deny the allegations set forth in  
5 paragraph 195 of the complaint in their entirety.

6  
7 196. These answering defendants lack sufficient information  
8 and/or belief to admit the allegations set forth in paragraph 186 of the  
9 complaint and therefore, on that basis, deny those allegations in their  
10 entirety.

11  
12 197. These answering defendants deny the allegations set forth in  
13 paragraph 197 of the complaint in their entirety.

14 **AFFIRMATIVE DEFENSES**

15 As and for its separate, alternative, affirmative defenses to the allegations  
16 made against it in the complaint filed in the above-entitled matter, defendant  
17 avers and alleges as follows:

18  
19 **Affirmative Defense No. 1**

20 The parties have reached accord and satisfaction as to some, or all of the  
21 causes of action alleged in the complaint;

22  
23 **Affirmative Defense No. 2**

24 Plaintiffs have expressly, or impliedly assumed the risk of each and every  
25 peril that is the subject of some, or all of the complaint filed in the above-  
26 entitled matter.

27  
28 ///

**Affirmative Defense No. 3**

Plaintiffs have voluntarily assumed the risk of any course of action alleged to have been taken upon by these answering defendants.

**Affirmative Defense No. 4**

To the extent that any cause alleged against these answering defendants in the complaint includes negligence on the part of these answering defendants, any damage resulting therefrom must be reduced by a sum according to proof as a result of plaintiffs' contributory negligence.

**Affirmative Defense No. 5**

Plaintiffs are estopped from instituting and/or maintaining this action against these answering defendants.

**Affirmative Defense No. 6**

Plaintiffs' fraud is the actual and proximate cause of any damage alleged to have accrued to plaintiffs in this matter.

**Affirmative Defense No. 7**

Any right or rights asserted by plaintiffs to accrue to them in this matter is would be illegal if applied, or enforced.

**Affirmative Defense No. 8**

This action and any remedy that may accrue to plaintiffs as a result of any allegation, or allegations set forth in plaintiffs' complaint is barred by the doctrine of laches.

///

**Affirmative Defense No. 9**

At the time these answering defendants are alleged to have performed unlawful actions, they were doing so, if at all, under valid and subsisting license from the plaintiffs or otherwise obtained.

**Affirmative Defense No. 10**

This action is barred in whole or in part by the doctrine of res judicata.

**Affirmative Defense No. 11**

This action is barred by the applicable statute of limitation.

**Affirmative Defense No. 12**

Plaintiffs have expressly, or impliedly waived any rights, or claims they may have against these answering defendants.

**Affirmative Defense No. 13**

Plaintiffs lack standing to assert the causes of action set forth in the complaint.

**Affirmative Defense No. 14**

Any trade mark that inures to the benefit of plaintiffs are unenforceable by reason of plaintiffs' present and past use of those marks in a constant and systematic manner to circumvent the anti trust laws and to stifle competition as provided in 15 U.S.C. § 1115(b) (7)

**WHEREFORE**, these answering defendants pray:

1. That plaintiffs take nothing by way of their action;

2. That judgment enter in favor of these answering defendants on each and every cause alleged by plaintiffs;
3. For an award of costs of this action, including a reasonable attorney's fee where authorized by law, rule, custom, or practice; and
4. For such other and further relief as the court deems appropriate.

Dated: December 19, 2024  
LLP

Romaine Lokhandwala Law Group,

*William A. Romaine*

William A. Romaine, Southern  
District of Texas Bar #3896716, Attorneys  
for Defendant OZ Trading Group, Inc.  
3323 South Fairway Street, Suite 5,  
Visalia, California 93277  
559 625 6020 (Voice)  
559 625 6024 (Telecopier)

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